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Judge Timothy W. Dore  
CHAPTER 13  
Exparte

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

**WILLIAMS, Christopher James,**  
Debtor.

**WILLIAMS, Christopher James,**  
Plaintiff,

v.

**UNITED STATES OF AMERICA  
ACTING THROUGH THE U.S.  
DEPARTMENT OF EDUCATION et al**  
Defendant.

Number 22-11289

Adversary Number: 22-01062

**EXPARTE MOTION &  
DECLARATION FOR ORDER  
DISMISSING MOHELA**

COMES NOW, Christopher James Williams, Plaintiff herein, and moves the Court for an  
Order dismissing MOHELA as defendant in this adversary proceeding.

This motion is based upon the Declaration of Plaintiff's counsel, Travis A. Gagnier.

Dated this 12<sup>th</sup> day of July 2023.

Law Offices of Travis Gagnier, Inc., P.S.  
Attorneys for Plaintiff

/s/ Travis A. Gagnier  
Travis A. Gagnier, WSBA #26379  
Gregory Jalbert, WSBA #9480  
Of Counsel

1. I am counsel of record for the Plaintiff herein.
2. I have personal knowledge of the following facts and competent to testify regarding the same.
3. My office filed this adversary proceeding on behalf of the Plaintiff.
4. Subsequently I have been provided information from MOHELA that it does not own any of student loans involving Plaintiff but is merely a servicing agent for the US Department of Education. Based upon that information I believe it is proper to dismiss MOHELA as a defendant in this adversary proceeding.

Dated this 12<sup>th</sup> day of July 2023.

Presented by:  
Law Offices of Travis Gagnier, Inc., P.S.  
Attorneys for Plaintiff

/s/ Travis A. Gagnier  
Travis A. Gagnier, WSBA #26379  
Gregory Jalbert, WSBA #9480  
Of Counsel